

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**  
**Chapter 13 Standing Trustee**

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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

IN RE:  
TIMOTHY A MULLIGAN

**Case No.: 22-14677VFP**

**HEARING DATE: 08/04/2022**

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**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The Debtor has failed to file all applicable Federal, State and local tax returns as required by 11 U.S.C. Section 1308, in violation of 11 U.S.C. Section 1325(a)(9).  
Specifically, 2016 - 2021 Tax Years per IRS Claim.
- The Trustee did not receive the required documentation in advance of the 341 meeting. Therefore, a meaningful 341 could not be conducted. The case will be presented for dismissal at confirmation.
- Debtor(s) failed to meet the requirements of 521(e)(2)(A)(i), in that the debtor(s) failed to produce a copy of the most recently filed pre-petition tax return or transcript thereof.
- Debtor(s):
  - Failed to make payments to the Standing Trustee as of July 1, 2022.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied and the case be dismissed.

Dated: July 19, 2022

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee